

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

CASE NO. 4:19-CV-00957

**CLASS PLAINTIFFS' UNOPPOSED MOTION TO SEAL THEIR REPLY IN
SUPPORT OF THEIR MOTION TO UNSEAL DEFENDANT MCMULLEN'S
MOTION FOR SUMMARY JUDGMENT AND ACCOMPANYING EXHIBITS**

Class Plaintiffs in the above-captioned action respectfully request leave to file under seal unredacted copies of their Reply In Support of Their Motion to Unseal Defendant McMullen's Motion for Summary Judgment and Accompanying Exhibits (the "Reply"). The Defendants do not object to the relief sought in this motion.

As grounds for this motion, Class Plaintiffs state as follows:

1. On August 17, 2021, the Court entered the Stipulation and Protective Order ("PO"), which governs the handling of confidential information exchanged in discovery in this matter.
2. According to Paragraph 24 of the PO, "[i]f any party submits Confidential Discovery Material or Confidential Attorney Eyes Only Discovery Material to the Court, the submission must be filed only under seal on CM/ECF if filed electronically[.]" PO at ¶24 (emphasis added).

3. The Reply contains, describes and refers to non-public documents and information that has been designated by the parties and nonparties as Confidential Discovery Material and/or Confidential Attorney Eyes Only Discovery Material, pursuant to the PO.

4. On December 19, 2023, prior to filing of their Reply, Class Plaintiffs asked counsel for Bayou City Energy (“BCE”) and counsel for William McMullen (“McMullen”) by email if they opposed to the filing of the Reply under seal, and counsel stated by email that they have no objections.

5. Today, Class Plaintiffs filed the Reply under seal. Class Plaintiffs will file public, redacted versions of the Reply within five (5) business days.

6. Class Plaintiffs are bound by the provisions of the agreed-upon Protective Order that this Court ordered on August 17, 2021, and therefore must seek leave to file their Reply under seal.¹

THEREFORE, Class Plaintiffs request that the Court grant their request for leave to file under seal an unredacted copy of their Reply In Support of Their Motion to Unseal Defendant McMullen’s Motion for Summary Judgment and Accompanying Exhibits.

¹ Class Plaintiffs note that under Paragraph 14 of the Protective Order, any party may seek a meet and confer within five days of filing of documents under seal to discuss whether any or all of the documents require being submitted under seal, or should remain under seal, in accordance with the law governing the sealing of documents. If the parties are unable to reach agreement, any party objecting to the filing under seal may file a motion to unseal.

Dated: December 20, 2023

/s/ Andrew J. Entwistle

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Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I certify that on December 19, 2023, counsel for Class Plaintiffs conferred with counsel for BCE and McMullen regarding the substance of this Motion. No parties opposed.

/s/ Andrew J. Entwistle
Andrew J. Entwistle